

1 Scott A. Kronland (SBN 171693)
2 Stacey M. Leyton (SBN 203827)
3 Eileen B. Goldsmith (SBN 218029)
4 Danielle E. Leonard (SBN 218201)
5 Robin S. Tholin (SBN 344845)
6 James Baltzer (SBN 332232)
7 ALTSHULER BERZON LLP
8 177 Post Street, Suite 300
9 San Francisco, CA 94108
10 Tel. (415) 421-7151
11 Fax (415) 362-8064
12 skronland@altber.com
13 sleyton@altber.com
14 egoldsmith@altber.com
15 dleonard@altber.com
16 rtholin@altber.com
17 jbaltzer@altber.com

18 *Attorneys for Plaintiffs*

19 [Additional Counsel not listed]

20 UNITED STATES DISTRICT COURT

21 FOR THE NORTHERN DISTRICT OF CALIFORNIA

22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF
24 GOVERNMENT EMPLOYEES, AFL-CIO;
25 AMERICAN FEDERATION OF STATE
26 COUNTY AND MUNICIPAL EMPLOYEES,
27 AFL-CIO, et al.,
28

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**PLAINTIFFS' NOTICE OF
DEPOSITION OF CHARLES
EZELL**

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 26 and 30, Plaintiffs, by and through undersigned counsel, will take the deposition of Charles Ezell on **March 11, 2025 at 11:00 a.m.** **PST** at 80 F Street, NW, Washington, DC 20001, as agreed upon by the parties. The deposition will be taken before a person authorized by law to administer oaths under Federal Rules of Civil Procedure 28(a) and shall continue from one day to the next, excluding Sundays and holidays, until the examination is completed.

Plaintiffs intend and reserve the right to record the deposition testimony of Charles Ezell by videotape and instant visual display, in addition to recording the testimony stenographically and via LiveNote/Realtime, and further intend and reserve the right to provide a secure live internet, video, audio and/or telephonic stream for parties and counsel of record. Plaintiffs reserve the right to use the videotape deposition at the time of trial.

1 DATED: March 6, 2025

Scott A. Kronland
Stacey M. Leyton
Eileen B. Goldsmith
Danielle E. Leonard
Robin S. Tholin
James Baltzer
ALTSHULER BERZON LLP
177 Post St., Suite 300
San Francisco, CA 94108
Tel: (415) 421-7151

7 By: /s/ Danielle E. Leonard
8 Danielle E. Leonard

9 *Attorneys for Plaintiffs*

10
11 Norman L. Eisen (*pro hac vice forthcoming*)
12 Pooja Chadhuri (SBN 314847)
13 STATE DEMOCRACY DEFENDERS
14 FUND
15 600 Pennsylvania Avenue SE #15180
Washington, DC 20003
Tel: (202) 594-9958
Norman@statedemocracydefenders.org
Pooja@statedemocracydefenders.org

16
17 By: /s/ Norman L. Eisen

18 *Attorneys for Plaintiffs*

19
20 Rushab Sanghvi (SBN 302809)
21 AMERICAN FEDERATION OF GOVERNMENT
22 EMPLOYEES
23 80 F Street, NW
Washington, DC 20001
Tel: (202) 639-6426
Sanghr@afge.org

24
25 By: /s/ Rushab Sanghvi

26 *Attorneys for Plaintiff American Federation of
27 Government Employees (AFGE)*

Teague Paterson (SBN 226659)
Matthew Blumin (*pro hac vice forthcoming*)
AMERICAN FEDERATION OF STATE, COUNTY,
AND MUNICIPAL EMPLOYEES
1625 L Street, N.W.
Washington, D.C. 20036
Tel: (202) 775-5900
Tpaterson@afscme.org
MBlumin@afscme.org

By: s/Teague Paterson

*Attorneys for Plaintiff American Federation of State
County and Municipal Employees (AFSCME)*

PROOF OF SERVICE

I am employed in the City and County of San Francisco, California. I am over the age of eighteen years and not a party to the within action; my business address is 177 Post Street, Suite 300, San Francisco, California 94108. On March 6, 2025, I served the following document(s):

PLAINTIFFS' NOTICE OF DEPOSITION OF CHARLES EZELL

on the parties, through their attorneys of record, as designated below:

By Electronic Service: By Email, I caused such document(s) to be served via electronic mail on the parties in this action by transmitting true and correct copies to the following email address(es):

KELSEY J. HELLAND
Assistant United States Attorney
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
kelsey.helland@usdoj.gov

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed March 6, 2025, at San Francisco, California.

/s/ Giorgia Lingiardi
Giorgia Lingiardi